

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

Lourdes E. Rosario	:	
	:	Docket No. 16-01927-JJT
	:	
M&T Bank	:	Chapter 13
Movant	:	
Vs.	:	
	:	
Lourdes E. Rosario	:	
Respondent	:	
And	:	
Charles J. DeHart III, Esquire	:	
Trustee	:	

RESPONSE TO MOTION FOR RELIEF FROM STAY

AND NOW, comes the Respondent, Lourdes E. Rosario by and through her undersigned counsel, Michael J. McCrystal, Esquire and avers:

1. Admitted.
2. Admitted.
3. Admitted.
4. After reasonable investigation, the answering respondent cannot admit or deny the truth or falsity of this averment and the same is deemed to be denied. To the extent that an answer is deemed to be required, the same is specifically denied.

5. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure.
6. Denied as a conclusion of law to which no responsive pleading is required under the Federal Rules of Bankruptcy Procedure. To the extent that an answer is deemed to be required this averment is denied and it is averred to the contrary.
7. Denied as a conclusion of law to which no responsive pleading is required under the Federal Rules of Bankruptcy Procedure. To the extent that an answer is deemed to be required this averment is denied and it is averred to the contrary.
8. Denied, this averment is specifically denied.
9. Denied as a conclusion of law to which no responsive pleading is required under the Federal Rules of Bankruptcy Procedure.

WHEREFORE, Respondent prays this Honorable Court to deny the Motion for Relief from the Automatic Stay and for such other and further relief as this Honorable Court will deem just and equitable.

Respectfully submitted,

/s/ Michael J. McCrystal

Michael J. McCrystal, Esquire

Supreme Court ID No. 55064

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